

DLA PIPER LLP (US)

Richard A. Chesley
R. Craig Martin
Rachel Ehrlich Albanese
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 335-4500
Facsimile: (212) 335-4501

Presentment Date: Feb. 14, 2022 at 12:00 p.m. ET
Objection Deadline: Feb. 14, 2022 at 11:00 a.m. ET

Counsel to Transform Holdco LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

Rel. Doc. ECF No. 10194

**NOTICE OF PRESENTMENT OF SCHEDULING ORDER FOR
TRANSFORM HOLDCO LLC'S MOTION TO ENFORCE THE ORDER
(I) AUTHORIZING ASSUMPTION AND ASSIGNMENT OF LEASE WITH
MOAC MALL HOLDINGS LLC AND (II) GRANTING RELATED RELIEF**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

PLEASE TAKE NOTICE that Transform Holdco LLC (“Transform”) will present the *Scheduling Order for Transform Holdco LLC’s Motion to Enforce the Order (I) Authorizing Assumption and Assignment of Lease with MOAC Mall Holdings LLC and (II) Granting Related Relief* (the “Scheduling Order”), attached hereto as **Exhibit 1**, to the Honorable Robert D. Drain of the United States Bankruptcy Court for the Southern District of New York (the “Court”), 300 Quarropas Street, White Plains, NY 10601, on **February 14, 2022 at 12:00 p.m. (prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Scheduling Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefor, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>), with a hard copy delivered directly to chambers and served so as to be actually received no later than **February 14, 2022 at 11:00 a.m. (prevailing Eastern Time)** (“Objection Deadline”), by (i) counsel to Transform; DLA Piper LLP (US), 1251 Avenue of the Americas, New York, NY 10020-1104, Attn: Richard A. Chesley, Esq., R. Craig Martin, Esq. and Rachel Ehrlich Albanese, Esq. (richard.chesley@us.dlapiper.com, craig.martin@us.dlapiper.com, rachel.albanese@us.dlapiper.com); and (ii) the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn. Richard C. Morrissey (richard.morrissey@usdoj.gov).

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and received by the Objection Deadline, the Scheduling Order may be granted without further notice or a hearing. If an objection is filed, you will be notified of a hearing to consider the requested relief.

PLEASE TAKE FURTHER NOTICE that you may also obtain copies of any pleadings by visiting the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: New York, New York
February 9, 2022

Respectfully submitted,

DLA Piper LLP (US)
1251 Avenue of the Americas, 27th Floor
New York, NY 10020-1104
Phone: (212) 335-4500
Fax: (212) 335-4501

By: /s/ Rachel Ehrlich Albanese

Richard A. Chesley
R. Craig Martin
Rachel Ehrlich Albanese

Counsel to Transform Holdco LLC